

EXHIBIT

15

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION**

NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE,
INC., *et al.*,

Plaintiffs,

v.

CITY OF MYRTLE BEACH, *et al.*,

Defendants.

Civil Action No. 4:18-cv-00554-MGL

DECLARATION OF BRIDGET HARRISON

I, Bridget Harrison, hereby state as follows:

1. I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth herein.
2. I am a resident of Myrtle Beach, South Carolina. I have lived in Myrtle Beach for twenty years. I am white.
3. I currently work at a motel on Ocean Boulevard in Myrtle Beach. I have worked at this motel since 2005.
4. I have worked at the motel during Harley Week, Black Bike Week, and other large events every year since 2005.
5. Visitors during Black Bike Week are treated differently than visitors during any other time of the year in Myrtle Beach.
6. I always enjoyed working at the motel during Black Bike Week because of the customers who return every year for Black Bike Week. These long-time customers are mostly

middle-aged African-Americans. They have become my friends over the years and I would trust them with my life.

7. Before the Black Bike Week traffic plan was put in place in 2015, our customers used to barbeque and spend time together enjoying the outdoor grounds of the motel during Black Bike Week. It was like a family reunion. The motel property owners permit the use of our outdoor facilities by customers.

8. Every year since the traffic plan was put in place in 2015, which includes one-way traffic on Ocean Boulevard, the closure of side streets, pedestrian barricades, and the traffic loop, the police have not allowed my customers to enjoy the outdoor grounds of the motel property during Black Bike Week, even though they are allowed to do so by the motel owners. I observed police officers harass a group of six, older African-American customers for sitting out on the outdoor grounds of the motel property, rudely telling them that they could not sit there. The police officers told my customers that they must remain indoors or on the sidewalk near the front of the motel.

9. One time during Black Bike Week after the loop was implemented, the police threatened to arrest me because I would not instruct my customers to come indoors.

10. The police have also required our motel to hire additional security during Black Bike Week since the loop was put in place. This is completely unnecessary because we have never had problems with the behavior of our Black Bike Week customers.

11. The City attempts to cage in Black Bike Week visitors, and stop them from going anywhere, by implementing the traffic plan.

12. Because of police harassment and the traffic plan, some of my regular customers have refused to return to Black Bike Week. As a result, the rates to rent a room at the motel

during Memorial Day Weekend have decreased significantly. My other regular customers have stopped bringing their motorcycles.

13. I have gotten stuck in the loop every year since it was first put in place in order to return home from work at the motel during Black Bike Week.

14. My commute from home to work usually takes fifteen minutes. However, when the loop is in place, my commute takes one hour and fifteen minutes. The barricades even block the entrance to the motel, which prevents me from parking there during work. The traffic plan is frustrating to me and many local residents.

15. I have not observed any special policing or traffic restrictions during Harley Week, or any other large weekend besides Black Bike Week. During Harley Weekend, customers sit out in the parking lot of the motel late into the night and are not bothered by the police.

16. I have observed reckless behavior by large crowds of young, mostly white customers during the June graduation season. However, these customers are not subject to increased policing or traffic controls.

17. The obvious difference in the treatment of Black Bike Week visitors is not justified. It can only be explained by the race of Black Bike Week visitors.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED WITHIN THE UNITED STATES ON: October 31, 2018.

BY: Bridget Harrison
Bridget Harrison